

Najee Sabir Odoms

VS.

Pathfinder Inspections
Field Services, LLC

Civil Case No. _____
(To be assigned by Clerk of Court)

§ **JURY TRIAL DEMANDED** ☒ Yes ☐ No
§ (Check one)

(Enter full name of each Defendant, above)

I. JURISDICTION. State the grounds for filing this case in Federal Court (include federal statutes or U.S. Constitutional provisions). 28 Fed. Civil Act

2- Federal civil Acts.

Title 7 VII Civil Rights Act 1964
(on discrimination)

① Discrimination

② Harassment

③ Retaliation

Section - 1981 of Civil Rights Act of 1866.

① discrimination

SAMPLE COMPLAINT (2) Harassment¹
(3) Retaliation

II. PLAINTIFF. For each Plaintiff list: name and address including City, County and State.

NaJee Odoms
4304 Emerald Forest Dr.
Apt. E
Durham, NC 27713

Durham County

III. DEFENDANT. For each Defendant list: name and address including City, County and State.

Pathfinder Inspections
Field Services, LLC
3197 111th Ave SW,
Dickinson, ND 58601

Stark County

IV. CLAIM. State the facts of your claim. Include the name of each person involved, dates and places. Be as specific as possible. Do not give any legal argument or cite any cases or statutes. Use additional sheets of paper if necessary.

I started working for Pathfinder Inspection on 07/15/20 and was fired on 07/20/20 due to Discrimination, Harassment, and Retaliation. The discrimination happened on multiple occasions by the employee's, when I spoke up for myself I was assaulted and then fired by the owner Kati Rudolph. Since this matter I've hired an attorney who has filed charges through the North Dakota department of Labor and EEOC. Unfortunately, the attorney is not licensed in the state of ND so I will be filing these charges myself until I find a licensed attorney who could represent me. I do have witnesses, video evidence, and text messages to prove my case.

V. ADMINISTRATIVE PROCEDURES. If applicable, state whether your claim was heard by any administrative agencies; the type of proceedings; the date and place of any proceedings; the outcome of any administrative proceedings.

Charges were filed through the EEOC on 01/09/20. North Dakota Labor and Human Rights on 10/29/2020 did not find any probable cause.

VI. RELIEF. State what you want the Court to do for you.

I would like to get justice for myself in this wrongful discrimination. I was also fired for bringing this matter to upper management. I am seeking emotional damages, back-pay, Punitive damages, and front pay from the employer's involvement.

VII. SIGNATURE. Each Plaintiff must individually sign this complaint.

Signed this 13th day of January, 2021.

N. Adams

Signature of Plaintiff

Najee Adams

Printed Name of Plaintiff

4304 Emerald Forest Dr.
Mailing Address APT. E

Durham, NC 27713

City, State, Zip Code

919-519-9422

Telephone Number of Plaintiff

Signature of Plaintiff

Printed Name of Plaintiff

Mailing Address

City, State, Zip Code

Telephone Number of Plaintiff